

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ANGELICA JUNIOUS)	
)	
Plaintiff,)	
)	
v.)	Case No. 22-cv-3681
)	
SGT. W. BAKER, R/O C. CHENGARY, R/LT)	Judge Edmond E. Chang
PURCELL, OFFICER NEALON, OFFICER)	
WALZ, OFFICER RAHN, OFFICER GLAZIERS,)	Magistrate Judge Maria Valdez
COOK CUNTY SHERIFF TOM DART, and)	
COOK COUNTY, ILLINOIS)	
)	
Defendants.)	

**DEFENDANT BAKER'S UNOPPOSED MOTION FOR LEAVE TO SUBSTITUTE AS
COUNSEL AND TO JOIN REPLY IN SUPPORT OF MOTION TO STAY**

Defendant, Sgt. Baker, pursuant to Local Rule 83.17, moves this Court for leave to allow Kenneth M. Battle and Herbert L. Stride of O'Connor & Battle, LLP to enter their appearance nunc pro tunc in place of counsel of record and that Miguel Larios of the Cook County State's Attorney's Office be granted leave to withdraw his appearance on behalf of Sgt. Baker. Defendant Sgt. Baker also moves this court to join the Reply in Support of Motion to Stay, ECF No. 131. In support thereof, Defendant states as follows:

1. Assistant State's Attorney Miguel Larios currently has an appearance on file on behalf of Defendant Sgt. Baker. ECF No. 96.
2. Defendant Sgt. Baker wishes to substitute Kenneth M. Battle and Herbert L. Stride of O'Connor & Battle, LLP as counsel of record in this matter and requests that Miguel Larios' appearance in this case be terminated.
3. Defendant understands there is currently pending a motion to stay and that a reply by co-Defendants was filed on September 27, 2023. ECF No. 131.

4. Defendant understands that private counsels have also substituted in as counsel on behalf of the other defendants in this case.

5. Defendant Sgt. Baker moves this Honorable Court for an order granting his request for leave to join the Reply filed on September 27, 2023.

6. No party will be prejudiced by this substitution or joining the reply, nor will the substitution of counsel or joining the reply impose any undue delay in the proceedings.

7. Pursuant to this Court's Case Management Procedures, proposed counsel for Sgt. Baker spoke with Plaintiff's counsel, Devlin, Schoop, and there is no objection to the motion.

WHEREFORE, Defendant Sgt. Baker, respectfully requests that this Court enter an order allowing Kenneth M. Battle and Herbert L. Stride of O'Connor & Battle, LLP to enter their appearances nunc pro tunc on behalf of Defendant Sgt. Baker, and that Miguel Larios be granted leave to withdraw his appearance on behalf of Sgt. Baker in this case, and that Defendant Sgt. Baker be allowed to join the Reply in Support of Motion to Stay, ECF No. 131, and for such further relief as this court deems just and equitable.

Respectfully submitted,

SGT. BAKER,

By: /s/ Kenneth M. Battle
One of His Attorneys

Kenneth Battle
Herbert L. Stride
O'Connor & Battle LLP
111 W. Jackson Blvd., Suite 1700
Chicago, Illinois 60604
(312) 786-4600
kbattle@mokblaw.com
cstride@mokblaw.com

CERTIFICATE OF SERVICE

I, Kenneth M. Battle, an attorney, certify that a copy of the attached instrument was served via electronic case filing to all parties of record, on this 12th day of October, 2023.

/s/ Kenneth M. Battle_____